UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

WINKLEVOSS CAPITAL FUND, LLC,

Plaintiff,

v.

CHARLES SHREM,

Defendant.

Case No.

AFFIDAVIT OF JOHN MASON IN SUPPORT OF EX PARTE APPLICATION FOR PREJUDGMENT ATTACHMENT

18 CV 8250

- I, John Mason, hereby declare as follows:
- I am a licensed private investigator in California. Except as to matters stated on information and belief, I have personal knowledge of the information referenced herein and could competently testify as to its truth if called to do so. As to matters stated on information and belief. I am informed and believe them to be true.
- 2. At the direction of Attorney Sam Ferguson of the Meade Firm I used public records and investigative databases to evaluate the assets of Charles Shrem in light of public statements Mr. Shrem has made about his assets in media interviews and on social media. A compilation of true and correct copies of some of Mr. Shrem's public statements is attached as Exhibit A.
- 3. Records show that Mr. Shrem bought six real properties in Sarasota County, Florida, between July 2017 and July 2018, paying a total of \$4,054,300. True and correct copies of the deeds for each of these six properties, which show the purchase price for each property, are attached hereto as Exhibit B.

- 4. I found no deed of trust recorded for any of the six properties, indicating that Mr. Shrem paid for each with cash. Exhibit C is a true and correct screenshot from the Official Records of Sarasota County showing the result of a search query using Mr. Shrem's name and encompassing every type of document recorded in Sarasota County.
- 5. According to Florida DMV records and the vehicle information database maintained by the Florida Department of Highway Safety and Motor Vehicles, Mr. Shrem is the registered owner of a 2009 and a 2013 Maserati automobile, each of which he appears to have bought with cash in February and July of 2018, respectively. Exhibit D includes true and correct copies of these records from the Florida DMV and the Department of Highway Safety and Motor Vehicles.
- 6. The combined estimated retail price of the two Maseratis is \$277,900, according to the base price disclosed on each of the vehicle's registration. Exhibit E is a true and correct copy of information on Shrem's vehicle registrations as maintained by LexisNexis.
- 7. According to investigative databases, Mr. Shrem is the owner of an 18-foot and a 36-foot powerboat, registered by Mr. Shrem in November of 2017 and February of 2018, respectively. The aforementioned Florida vehicle information database indicates that neither vessel is encumbered by a lien, indicating that Mr. Shrem paid for each with cash. A true and correct copy of records from the Florida vehicle information database is attached hereto as Exhibit F.
- 8. On June 6, 2018, a mortgage was recorded in Sarasota County securing a \$250,000 hard-money loan made by Amalgamated Suncoast Florida Portfolio LLC, a Florida entity formed by Mr. Shrem on May 15, 2018, and solely managed by Mr. Shrem. True and correct copies of the Mortgage recorded in Sarasota County and the Articles of Incorporation for

Amalgamated Suncoast Florida Portfolio LLC from the Florida Secretary of State are attached hereto as Exhibit G.

I declare under penalty of perjury under the laws of the United States and the State of New York that the foregoing is true and correct to the best of my knowledge.

Executed on 9/6/2018 in Berkeley, California.

John Mason